

BRETT A. SHUMATE
Assistant Attorney General
Civil Division
ERIC J. HAMILTON
Deputy Assistant Attorney General
JOSEPH E. BORSON
Assistant Branch Director
JASON ALTABET (Md. Bar No. 2211280012)
Trial Attorney, U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Tel.: (202) 305-0727
Email: Jason.k.altabet2@usdoj.gov
KATHRYN BARRAGAN (D.C. Bar No. 90026294)
Tel.: (202) 598-7696
Email: kathryn.e.barragan@usdoj.gov

Attorneys for United States

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

NEETA THAKUR, <i>et al.</i> ,)	Case No. 25-cv-4737-RFL
Plaintiffs,)	
v.)	DECLARATION OF JASON ALTABET IN
)	SUPPORT OF DEFENDANTS' OPPOSITION TO
)	PLAINTIFFS' MOTION FOR ADDITIONAL
)	PRELIMINARY INJUNCTION
DONALD J. TRUMP, in his official capacity as)	
President of the United States, <i>et al.</i> ,)	Hearing Date: August 26, 2025
)	Time: 10:00 AM
Defendants.)	Judge: Hon. Rita F. Lin
)	Place: San Francisco Courthouse
)	Courtroom 15

1 I Jason Altabet declare as follows:

2 1. I am employed as a Trial Attorney for the United States Department of Justice, Civil Division,
3 Federal Programs Branch. I represent Defendants in this action. I have personal knowledge of the
4 matters set forth below, except those matters that are based on information and belief, which I believe to
5 be true, and could and would testify competently to them if called to do so.

6 2. On July 25, 2025, Defendants produced expedited discovery to Plaintiffs from Defendants
7 Department of Defense and Department of Transportation.

8 3. Attached to this declaration as Exhibit A is a true and correct excerpt of a spreadsheet
9 produced to Plaintiffs from Defendant Department of Defense as DEFSDOD_00041. I personally
10 excerpted this spreadsheet to only show the grant "FA9550-23-1-0437" associated with Plaintiff
11 Berman. Berman Decl. ¶ 23, ECF No. 69. I excerpted this copy as to not disclose in a public filing the
12 details of other grants for individuals other than Plaintiff-Berman that are included on the spreadsheet.
13 Defendants produced the non-excerpted spreadsheet to Plaintiffs in their production.

14
15 I declare under penalty of perjury under the laws of the District of Columbia and the United
16 States that the foregoing is true and correct.

17 Executed this 8th day of August, 2025, in Washington D.C.

18
19 /s/ Jason Altabet

20 JASON ALTABET (Md. Bar No. 2211280012)